

Message

From: Mugdan.Walter@epamail.epa.gov [Mugdan.Walter@epamail.epa.gov]
Sent: 12/17/2010 10:06:35 PM
To: Larry Levine [llevine@nrdc.org]; Enck.Judith@epamail.epa.gov
CC: rtroutman [rtroutman@riverkeeper.org]; mannaajo [mannajo@clearwater.org]; Althea Mullarkey [amullarkey@scenichudson.org]; Paul Gallay [PGallay@riverkeeper.org]; nsullivan [nsullivan@scenichudson.org]; Conetta.Benny@epamail.epa.gov; Doug Garbarini [Garbarini.Doug@epamail.epa.gov]; David King [king.david@epa.gov]
BCC: Mugdan.Walter@epamail.epa.gov
Subject: Re: follow-up questions/requests

Here are some initial answers to two of your questions. We'll get you additional replies as soon as possible. (I'm sorry if the formatting below is not ideal -- I'm working from a blackberry, cutting-and-pasting from information sent me by Ben Conetta of my staff, who is foolishly still in the office whereas I am not).

How many cubic yards of sediment are estimated to be targeted for dredging in Phase 2? (I.e., how many cubic yards of sediment correspond to the estimate of 144,000-200,000 kg of PCBs?)

From Phase 1 evaluation report: "The re-estimates of dredging volume, based on experience gained during Phase 1, yield estimated dredging volumes of 2,600,800 to 2,872,000 CY, which are still very close to the original dredging volume estimated in the ROD."

Since Phase 1 removed about 290,000 CY, the remaining 144,000-200,000 kg of PCBs are associated with 2,300,000 to 2,600,000 cy of contaminated sediment remaining.

--In portions (i.e., nodes) of Phase 1 that were capped, what % PCB removal was achieved? (To the extent you have them, we'd be interested in both aggregate numbers and numbers reflecting subsets of Phase 1 area, such as areas capped b/c of bedrock/clay, or areas capped for reasons other than bedrock/clay/debris/ran-out-of-time.

We can provide a partial response at this time. Phase 1 removed roughly 20,000 kg of Total PCBs from all 10 CUs. The total mass left behind, including both capped (noncompliant) and backfilled (compliant areas) was estimated at 1,600 kg. This represents 7.5 percent left behind or 92.5 percent removal overall. If CU 1 is removed (EPA and GE both consider CU 1 unusual) approximately 98 percent the mass was removed (only 2 percent of the total mass was left behind). The remaining 9 CU's represented 19,500 kg of the 20,000 kg removed. For these 9 CUs, the total mass left behind was 460 kg.

EPA expects that the success observed in the other 9 CU's would be more representative of results expected for Phase 2. The new standards in place would specifically deal with many of the difficulties encountered in CU 1 (including the requirement to dig thru debris fields unless it can be definitively shown that there is no contamination present, requirements for removal of residuals and inventory, and no schedule constraints for capping).

Sent by EPA Wireless E-Mail Services

From: "Levine, Larry" [llevine@nrdc.org]
Sent: 12/17/2010 09:43 AM EST
To: Judith Enck; Walter Mugdan
Cc: <rtroutman@riverkeeper.org>; <mannajo@clearwater.org>; "Althea Mullarkey" <amullarkey@scenichudson.org>; "Paul Gallay" <PGallay@riverkeeper.org>; <nsullivan@scenichudson.org>
Subject: follow-up questions/requests

Hi Judith and Walter,

I'd like to express again everyone's appreciation of the time you took last night to give us a preview of today's announcement. We'd like to take you up on your offer to send a couple of follow-up questions/requests this

morning. As the environmental community talks among ourselves about our initial reactions to the decision, we'd very much like to know the following, assuming you have these numbers available. Thanks again – I know we'll be continuing the dialogue in the coming days and weeks.

-Larry

--How many cubic yards of sediment are estimated to be targeted for dredging in Phase 2? (I.e., how many cubic yards of sediment correspond to the estimate of 144,000-200,000 kg of PCBs?)

--In portions (i.e., nodes) of Phase 1 that were capped, what % PCB removal was achieved? (To the extent you have them, we'd be interested in both aggregate numbers and numbers reflecting subsets of Phase 1 area, such as areas capped b/c of bedrock/clay, or areas capped for reasons other than bedrock/clay/debri/ran-out-of-time.

--In portions (i.e., nodes) of Phase 1 that did not require capping, what % PCB removal was achieved?

--We would like to get a copy, as soon as possible, of any statistical or other analysis supporting the projection that at least 95% of the PCB mass will be removed.

--Finally, could you confirm the following numbers Walter offered last night based on his recollection, and provide any available written analysis showing the calculations:

-in Phase 1, where inventory was left behind under caps, it was limited to one 6" segment below the top 6 inches, and was "usually confined to 6-20ppm." (Also, what was the range of values, i.e., maximum amount?)

-in Phase 1, the highest nodes in a CU were generally between 10-20ppm. (Also, what was the range of values, i.e., maximum amount?)

Lawrence Levine
Senior Attorney, Natural Resources Defense Council
40 W. 20th Street
New York, NY 10011
(212) 727-4548

Join us on Facebook: <http://www.facebook.com/nrdcnwvork>
Follow us on Twitter: <http://twitter.com/NRDCNY>